

# **EXHIBIT B**

Phillip Low

January 14, 2006

Boulder, CO

1

UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF DELAWARE

LP MATTHEWS, LLC, )

Plaintiff, )

v. )

BATH & BODY WORKS, INC.; ) CASE NO.:

LIMITED BRANDS, INC.; ) 04-CV-01507 SLR

KAO BRANDS CO. (f/k/a THE )

ANDREW JERGENS COMPANY); )

and KAO CORPORATION, )

Defendants. )

-----

DEPOSITION OF PHILLIP LOW

Saturday, January 14, 2006

Reported by:

Craig L. Knowles, CM

Henderson Legal Services  
(202) 220-4158

Phillip Low

January 14, 2006

Boulder, CO

2	<p>1 Boulder, Colorado</p> <p>2 Saturday, January 14, 2006</p> <p>3</p> <p>4 Deposition of PHILLIP LOW, a witness</p> <p>5 herein, called for examination by counsel for</p> <p>6 Defendants in the above-entitled matter, pursuant</p> <p>7 to notice and the Federal Rules of Civil Procedure,</p> <p>8 the witness being previously duly sworn by CRAIG</p> <p>9 KNOWLES, a Notary Public in and for the State of</p> <p>10 Colorado, taken at the Boulder Marriott, Telluride</p> <p>11 Room, 2660 Canyon Boulevard, Boulder, Colorado, at</p> <p>12 9:23 a.m., on Saturday, January 14, 2006, and the</p> <p>13 proceedings being taken down in Stenotype by CRAIG</p> <p>14 KNOWLES and transcribed under his direction.</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p>	4	<p>1 APPEARANCES (Cont'd)</p> <p>2</p> <p>3 For Defendants Bath &amp; Body Works and Limited</p> <p>4 Brands:</p> <p>5 John F. Ward, Esquire</p> <p>6 WARD &amp; OLIVO</p> <p>7 708 Third Avenue</p> <p>8 New York, New York 10017</p> <p>9 212-697-6262</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p>
3	<p>1 APPEARANCES</p> <p>2</p> <p>3 For Plaintiff:</p> <p>4 Robert A. Auchter, Esquire</p> <p>5 Jason R. Buratti, Esquire</p> <p>6 ROBINS, KAPLAN, MILLER &amp; CIRESI, LLP</p> <p>7 Suite 1200</p> <p>8 1801 K Street, Northwest</p> <p>9 Washington, D.C. 20006-1307</p> <p>10 202-775-0725</p> <p>11</p> <p>12 For Defendants KAO Corp. and KAO Brands:</p> <p>13 Stephen G. Baxter, Ph.D., Esquire</p> <p>14 Richard L. Chinn, Ph.D., Esquire</p> <p>15 OBLON, SPIVAK, McCLELLAND, MAIER &amp;</p> <p>16 NEUSTADT, P.C.</p> <p>17 1940 Duke Street</p> <p>18 Alexandria, Virginia 22314</p> <p>19 703-413-3000</p> <p>20</p> <p>21</p> <p>22</p>	5	<p>1 CONTENTS</p> <p>2 THE WITNESS: PAGE NO.</p> <p>3 PHILLIP LOW</p> <p>4 By Mr. Ward..... 6</p> <p>5 By Mr. Baxter..... 92</p> <p>6</p> <p>7 E-X-H-I-B-I-T-S</p> <p>8 LOW EXHIBIT NO. PAGE NO.</p> <p>9 1 Copy of Assignment, LPM 000012/14 38</p> <p>10 2 One-page handwritten document PL 0002 39</p> <p>11 3 Agreement PL 0001 44</p> <p>12 4 Promissory Note PL 0003/4 47</p> <p>13 5 Copy of envelope from Mr. Brady PL 00005 48</p> <p>14 6 Letter, Low to Ingram, 6/16/93 52</p> <p>15 7 Letter, Greenspan to Low, 6/26/93,</p> <p>16 PL 0007 54</p> <p>17 8 Envelope, Greenspan to Low, 6/21/93 57</p> <p>18 9 Undated Letter, Greenspan to Low PL 0009 75</p> <p>19 10 Copy of check stub PL 0010 78</p> <p>20 11 Three-page document, 11/17/89 DG6001/03 109</p> <p>21 12 Two-page document DG3271/72 113</p> <p>22</p>

Phillip Low

January 14, 2006

Boulder, CO

<p style="text-align: right;">6</p> <p>1 PROCEEDINGS:</p> <p>2 - - -</p> <p>3 Whereupon,</p> <p>4 PHILLIP LOW,</p> <p>5 called for examination by counsel for Defendants</p> <p>6 and, having been previously duly sworn to the</p> <p>7 truth, the whole truth and nothing but the truth,</p> <p>8 was examined and testified further upon his oath</p> <p>9 as follows:</p> <p>10 - - -</p> <p>11 EXAMINATION BY COUNSEL FOR DEFENDANT</p> <p>12 BATH &amp; BODY WORKS and LIMITED BRANDS</p> <p>13 BY MR. WARD:</p> <p>14 Q. Good morning, Mr. Low.</p> <p>15 A. Good morning.</p> <p>16 Q. My name is John Ward, I'm with Ward &amp; Olivo</p> <p>17 in New York, and I represent Limited Brands and</p> <p>18 Bath3 &amp; Body Works in this action.</p> <p>19 Have you ever been deposed before?</p> <p>20 A. Yes.</p> <p>21 Q. Would you tell me what were the</p> <p>22 circumstances of that?</p>	<p style="text-align: right;">8</p> <p>1 Q. Okay. Before that, school?</p> <p>2 A. Before that I was in school.</p> <p>3 Q. Did you graduate from high school?</p> <p>4 A. I did.</p> <p>5 Q. Any college?</p> <p>6 A. None.</p> <p>7 Q. Any technical training?</p> <p>8 A. Nope.</p> <p>9 Q. It's my understanding that you are the man</p> <p>10 who had the idea to use orange in a cleaning</p> <p>11 composition, is that true?</p> <p>12 A. That's true.</p> <p>13 Q. Can you tell me how that came about, how'd</p> <p>14 you get that idea?</p> <p>15 A. I was installing windows, and when you</p> <p>16 install windows, you have polyurethane type</p> <p>17 sealants that you use, two-part. And you get it</p> <p>18 all over your hands.</p> <p>19 Q. Tell me, what --</p> <p>20 A. Nothing really cleans it off.</p> <p>21 Q. Take me through the process. So you are</p> <p>22 installing a window.</p>
<p style="text-align: right;">7</p> <p>1 A. It was a building lawsuit.</p> <p>2 Q. Were you the plaintiff?</p> <p>3 A. We were.</p> <p>4 Q. How did it turn out?</p> <p>5 A. We won.</p> <p>6 Q. Good. Just so you know, you know, I'm</p> <p>7 going to ask a series of questions, you'll answer.</p> <p>8 You can't nod or make sounds that the court</p> <p>9 reporter can't record for us.</p> <p>10 And any time you feel like you'd like to</p> <p>11 take a break, say the word.</p> <p>12 A. Okay.</p> <p>13 Q. What do you do for a living?</p> <p>14 A. I have a home improvement and construction</p> <p>15 company.</p> <p>16 Q. How long have you had that?</p> <p>17 A. Ten years.</p> <p>18 Q. What did you do before that?</p> <p>19 A. I was a subcontract window installer.</p> <p>20 Q. Do you recall how long you were doing that</p> <p>21 for?</p> <p>22 A. Yeah, I have been doing that since 1979.</p>	<p style="text-align: right;">9</p> <p>1 A. Right.</p> <p>2 Q. You've got a frame. Run us through it.</p> <p>3 A. Well, you have a window opening. You take</p> <p>4 out the wood sashes. It depends how the window is</p> <p>5 measured, how the new system is going to go in.</p> <p>6 You are from the east, right?</p> <p>7 Q. Yes. You can tell, huh?</p> <p>8 A. You have a lot of wood windows, a lot of</p> <p>9 historic looking products, right.</p> <p>10 Q. Yes, indeed.</p> <p>11 A. Okay. What we will do is, we will take out</p> <p>12 the wooden sashes, leave the buck frame in. Then</p> <p>13 what we do is, we have a system that is</p> <p>14 historically replicated to cap over all of the old</p> <p>15 wood on the outside. And it's a new window frame</p> <p>16 that goes in on the inside and has new sashes and</p> <p>17 everything else. Then we seal up the outside, sort</p> <p>18 of a panning system out there. We seal up the</p> <p>19 panning system to make it weather tight. We put</p> <p>20 trims on the inside and seal that up to make it</p> <p>21 weather tight.</p> <p>22 Q. All right.</p>

Phillip Low

January 14, 2006

Boulder, CO

<p style="text-align: right;">10</p> <p>1 A. The caulking that we have to use, they</p> <p>2 need to have a very high flexibility rate. Have to</p> <p>3 be real durable stuff.</p> <p>4 Q. The reason is?</p> <p>5 A. So that they last 20 years. Ten year</p> <p>6 warranty, but if you go with a little bit stronger</p> <p>7 product, you don't -- you can't use a regular latex</p> <p>8 household type product. You have to use something</p> <p>9 that has kind of more your industrial adhesions,</p> <p>10 movements and those kind of things.</p> <p>11 Q. Okay.</p> <p>12 A. So that is the window process.</p> <p>13 Q. Thanks. I got new windows coming in, so I</p> <p>14 want to know what I'm looking forward to.</p> <p>15 A. Yours might be different. This is</p> <p>16 commercial. You may get vinyls.</p> <p>17 Q. Well, we'll see. Thank you, anyhow. So</p> <p>18 now we are up to, did you say polyurethane?</p> <p>19 A. Yeah, polyurethane type sealants.</p> <p>20 Q. What do you do?</p> <p>21 A. Use a caulking gun, they come in tubes, use</p> <p>22 a caulking gun or there's big sausages, different</p>	<p style="text-align: right;">12</p> <p>1 does the stuff start to harden?</p> <p>2 A. It's an oil based product so it stains, you</p> <p>3 get stains on your hands. It can last up to a week</p> <p>4 if you don't try to use something to take it off.</p> <p>5 Q. Okay.</p> <p>6 A. The only things we found that works is</p> <p>7 toluene or acetone or gasoline, the only stuff that</p> <p>8 removes this stuff.</p> <p>9 Q. Stuff like Goop doesn't work?</p> <p>10 A. No, Goop didn't work, pumices didn't work,</p> <p>11 none of that stuff works.</p> <p>12 Q. I think we are probably up on the orange</p> <p>13 part?</p> <p>14 A. We are up to the orange part. Okay?</p> <p>15 Q. Unless you tell me otherwise.</p> <p>16 A. This was like 10:30 at night and it was the</p> <p>17 first week in December because the Parade of lights</p> <p>18 was going on down below.</p> <p>19 Q. Do you remember the year?</p> <p>20 A. Yeah, it was 1988.</p> <p>21 Q. Okay?</p> <p>22 A. We were -- actually, I was working by</p>
<p style="text-align: right;">11</p> <p>1 means of putting this stuff on. It gets all over</p> <p>2 you because you are using your fingers to tool it.</p> <p>3 Q. Fill in the spots?</p> <p>4 A. Yeah, when you are caulking, it's like</p> <p>5 icing on the cake. It's the pretty part, yet it's</p> <p>6 the function part, too, because it weatherproofs,</p> <p>7 stains.</p> <p>8 You are also using a product called Fooz,</p> <p>9 which is manufactured out of parts, vinyl parts</p> <p>10 that you use to fill cracks and crevices and stuff</p> <p>11 like that, hardens up.</p> <p>12 All this stuff gets on your hands, because,</p> <p>13 you know, even ink gets on your hands, I don't know</p> <p>14 how it does, but it gets everywhere.</p> <p>15 Q. Sure.</p> <p>16 A. That is how the caulking gets on your</p> <p>17 hands.</p> <p>18 Now with respect to the orange product, is</p> <p>19 that where you want to go.</p> <p>20 Q. In a second.</p> <p>21 A. Okay.</p> <p>22 Q. Tell me. You have the caulk on your hands,</p>	<p style="text-align: right;">13</p> <p>1 myself, 10:30 at night, trying to caulk these</p> <p>2 windows up.</p> <p>3 Q. Obviously it was your business.</p> <p>4 A. My business.</p> <p>5 Q. I understand that part.</p> <p>6 A. I was trying to caulk the windows, 10th</p> <p>7 floor, and my wife packed me a lunch and the only</p> <p>8 thing I had left to eat was an orange, I needed</p> <p>9 something.</p> <p>10 Q. Sure.</p> <p>11 A. Work late obviously, wanted to get done.</p> <p>12 So I went to eat the orange, I'm peeling the</p> <p>13 orange, and I notice all this black stuff all over</p> <p>14 the orange peel. I'm thinking, now I got to go --</p> <p>15 something is contaminating my food. I didn't know</p> <p>16 what it was.</p> <p>17 Q. Right.</p> <p>18 A. I'm sitting here peeling this orange and</p> <p>19 it's turning black.</p> <p>20 Q. The rind is turning back?</p> <p>21 A. Yes, the orange, everything I'm touching on</p> <p>22 the orange is starting to turn black.</p>

Phillip Low

January 14, 2006

Boulder, CO

<p style="text-align: right;">14</p> <p>1 Q. So you can't even eat your orange now, you 2 are stuck?</p> <p>3 MR. BURATTI: Object to form.</p> <p>4 A. So I go and I wash my hands and I notice 5 that my fingertips are clean.</p> <p>6 BY MR. WARD:</p> <p>7 Q. Uh-huh.</p> <p>8 A. So I went back and I'm like what the heck 9 happened here. So I go back and I start looking at 10 the orange, and I started messing with the orange 11 peels. The orange juice, itself. Everything else. 12 And found out if I squeezed the rind on my hand, 13 that stuff dissolved, loosened up and I could 14 actually wipe it off.</p> <p>15 Q. You started to play around with it?</p> <p>16 A. Right.</p> <p>17 MR. BURATTI: Objection to form.</p> <p>18 BY MR. WARD:</p> <p>19 Q. What happened next.</p> <p>20 A. Obviously, I was excited because I thought 21 I could create a natural cleaning product that 22 would remove stuff off your hands that nothing else</p>	<p style="text-align: right;">16</p> <p>1 was doing, just like we all were. I didn't want to 2 be a windows installer forever. There didn't seem 3 to be any money in it. So I thought you know, I 4 called him up and I said you can't believe what I 5 just discovered.</p> <p>6 Q. Do you recall, was he your personal 7 accountant or the business's accountant?</p> <p>8 A. He was both. Well, you know at the time my 9 personal was my business.</p> <p>10 Q. Go ahead. So you give him a call. Do you 11 remember when that was?</p> <p>12 A. It would have been the next day.</p> <p>13 Q. Really. You were that excited?</p> <p>14 A. Oh, yeah, absolutely.</p> <p>15 MR. BURATTI: Objection to form.</p> <p>16 BY MR. WARD:</p> <p>17 Q. Okay.</p> <p>18 A. So anyway, I called him up and I told him 19 what the deal was, that I had found and he said, 20 Phil, you're a genius. And he said, let's -- I 21 said, you know, you got -- you're a chemist kind of 22 guy, maybe we can make a hand cleaner, some sort of</p>
<p style="text-align: right;">15</p> <p>1 would.</p> <p>2 Q. So even this first time it was working 3 better than the things you traditionally used to 4 clean your hands?</p> <p>5 MR. BURATTI: Objection. Ambiguous.</p> <p>6 A. I don't know, I didn't say that.</p> <p>7 BY MR. WARD:</p> <p>8 Q. I'm asking, not trying to tell.</p> <p>9 A. All I did, all I did was find that the 10 orange oil removed the stuff off my hands.</p> <p>11 Q. Were you surprised?</p> <p>12 A. I was surprised.</p> <p>13 Q. So what did you do about it?</p> <p>14 A. Well, then what I did is I called up Doug 15 Greenspan.</p> <p>16 Q. Why'd you do that?</p> <p>17 A. Because Doug, Doug and I had a fairly good 18 relationship. He was our accountant. And we knew 19 a little bit of his background. I knew that he had 20 an M.B.A. in business, and I knew that he had a 21 minor in chemistry, and I knew that he was looking 22 for, you know, something other than doing what he</p>	<p style="text-align: right;">17</p> <p>1 a natural cleaner that's going to work to take this 2 stuff off of our construction industry's hands.</p> <p>3 Q. All right. So what happened next?</p> <p>4 A. Then --</p> <p>5 Q. You talk on the phone, then --</p> <p>6 A. Yeah, well, I -- I hooked up with him. 7 That weekend, because it was -- I believe it was 8 a -- the Parade of Lights goes on Friday nights and 9 on Saturday. This would have been a Friday night, 10 caution I went over to his place on Saturday, so I 11 went on over there.</p> <p>12 Q. Okay.</p> <p>13 A. And we proceeded to try to find some orange 14 oil so that we could start making concoctions.</p> <p>15 Q. You didn't bring a bag of oranges over with 16 you?</p> <p>17 A. You know, we may have gotten a bag of 18 oranges. You know, I know that I had shown to him 19 that it actually worked, and he thought -- the 20 citric acid in there would naturally dissolve 21 petroleum products. Oh, you're a genius, I never 22 thought of that. So, anyway.</p>



Phillip Low

January 14, 2006

Boulder, CO

<p style="text-align: right;">26</p> <p>1 I knew, I would say try this and let me know what 2 you think. 3 Q. Do you remember the volume, the percentages 4 of this product, how much orange oil was in it, how 5 much of the other components? 6 MR. BURATTI: Objection. Compound. 7 A. You know, okay. So let me ask you a 8 question. What -- you need to clarify what it is 9 you are asking one more time? 10 BY MR. WARD: 11 Q. Yes, probably the easiest way to get at it 12 is, do you remember how much of the composition was 13 orange oil? 14 MR. BURATTI: Objection. Vague. 15 A. What we did is we started out with, we kind 16 of used the pH system, okay. And we would use I 17 would say 50 percent orange oil in the composition 18 to see what happened, and then we would drop it 19 down percentage-wise. I think we even went down to 20 1 percent, just a small amount of orange oil, based 21 on my wife's findings, we needed to figure, well, 22 maybe that's too much.</p>	<p style="text-align: right;">28</p> <p>1 A. No, I didn't record anything. That would 2 have been Doug. 3 BY MR. WARD: 4 Q. After somebody tried it for you you told 5 Doug what happened? 6 MR. BURATTI: Objection to form. 7 A. Yes, that is what happened. That didn't 8 work here, or it needs to be stronger, or it needs 9 to be less, or this one seems to burn and this one 10 didn't. 11 Q. And do you know if he kept records? 12 MR. BURATTI: Objection. 13 A. I don't know how he kept records, I 14 couldn't answer that. 15 BY MR. WARD: 16 Q. Did you ever see him write down the 17 information you gave him? 18 A. I saw him write down the information and I 19 saw him write down formulas. That was his -- 20 Q. He was the chemist, right? 21 MR. BURATTI: Object to form. 22 A. Right.</p>
<p style="text-align: right;">27</p> <p>1 But, you know, from the small amount on up 2 until we found where, A, pH worked well and, B, it 3 worked relatively well, cleaned off what it was we 4 wanted to clean off. 5 Q. Do you remember where that point was? 6 MR. BURATTI: Objection. 7 A. I don't remember that point. That's Doug's 8 deal. 9 BY MR. WARD: 10 Q. Do you recall ever testing it on anybody 11 other than the family? 12 A. No animals. 13 MR. BURATTI: Objection -- 14 A. No animal testing. 15 BY MR. WARD: 16 Q. Uh-huh. I understand. 17 A. I had a friend that -- I had a friend that 18 was working with me who used it from a window 19 installation standpoint, so -- 20 Q. When you did these tests do you remember if 21 you recorded the results in any way? 22 MR. BURATTI: Objection to form.</p>	<p style="text-align: right;">29</p> <p>1 (Discussion off the record.) 2 BY MR. WARD: 3 Q. Tell me, at this point did you and 4 Greenspan have any sort of an agreement? 5 MR. BURATTI: Objection. Vague. 6 A. I don't understand what you mean. 7 BY MR. WARD: 8 Q. Well, you are working together to make a 9 product, correct? 10 A. Correct. 11 Q. You are working together to get a patent 12 application on file, correct? 13 A. Correct. 14 Q. Did you have some sort of an understanding 15 of how you were going to split proceeds, if any? 16 MR. BURATTI: Objection. Vague. 17 A. We created I think a corporation called 18 Midwhelm. 19 Q. Could you spell that for us? 20 A. M-I-D-W-H-E-L-M. Midwhelm, something like 21 that. We didn't want to be an overwhelm and we 22 didn't want to be and underwhelm, so we figured</p>

Phillip Low

January 14, 2006

Boulder, CO

<p style="text-align: right;">86</p> <p>1 much as you want.</p> <p>2 THE WITNESS: I can read as much as I want?</p> <p>3 MR. BURATTI: The paragraph refers to tests</p> <p>4 in the patent, I just wanted to alert you, you are</p> <p>5 allowed to read more to get up to speed.</p> <p>6 THE WITNESS: Okay.</p> <p>7 MR. BURATTI: You don't have to. You can</p> <p>8 hear the question first.</p> <p>9 THE WITNESS: Roll with the question.</p> <p>10 BY MR. WARD:</p> <p>11 Q. Do you remember how you came up with that</p> <p>12 five percent figure?</p> <p>13 MR. BURATTI: Object to the form.</p> <p>14 A. Well, as I said earlier, we took from</p> <p>15 probably 50 percent orange oil down to maybe even</p> <p>16 one percent and found -- found it worked for what</p> <p>17 we needed it to work.</p> <p>18 And with respect to cosmetics, it would</p> <p>19 have had to do with the burning of my wife's</p> <p>20 eyelids.</p> <p>21 BY MR. WARD:</p> <p>22 Q. That is when the orange oil --</p>	<p style="text-align: right;">88</p> <p>1 one percent level?</p> <p>2 A. I don't remember.</p> <p>3 MR. BURATTI: Objection.</p> <p>4 THE WITNESS: Sorry. I'll slow down for</p> <p>5 you.</p> <p>6 MR. BURATTI: Objection to form.</p> <p>7 MR. WARD: The reporter will catch up with</p> <p>8 us. Don't worry.</p> <p>9 MR. AUCHTER: It's not fair to the</p> <p>10 reporter.</p> <p>11 BY MR. WARD:</p> <p>12 Q. Let's go to Column 9. Just a quick</p> <p>13 question. The last page. Do you see line 4,</p> <p>14 Claim 1 starts on line 4.</p> <p>15 A. Okay.</p> <p>16 Q. Do you want to read that to yourself?</p> <p>17 A. Okay.</p> <p>18 Q. Claim 1 discloses a composition that has</p> <p>19 three ingredients.</p> <p>20 MR. BURATTI: Objection. Sorry.</p> <p>21 BY MR. WARD:</p> <p>22 Q. The first ingredient is identified as</p>
<p style="text-align: right;">87</p> <p>1 A. There was too much.</p> <p>2 Q. There was too much orange oil in that</p> <p>3 initial sample?</p> <p>4 A. Right.</p> <p>5 MR. BURATTI: Objection. Vague.</p> <p>6 BY MR. WARD:</p> <p>7 Q. Do you remember was that a 50 percent</p> <p>8 sample?</p> <p>9 A. I don't believe that was 50, no. But I</p> <p>10 can't -- I don't remember what percentage that was.</p> <p>11 Q. You said you went down all the way to</p> <p>12 one percent?</p> <p>13 A. We went almost down to nothing and then</p> <p>14 back up to see where the effect started in.</p> <p>15 Q. Was it your conclusion that the effects</p> <p>16 started in at five percent?</p> <p>17 MR. BURATTI: Objection misleading.</p> <p>18 A. As far as any conclusions, I didn't come to</p> <p>19 any conclusions, all I was after was my specific</p> <p>20 target was for caulking. Me personally.</p> <p>21 BY MR. WARD:</p> <p>22 Q. Sure. Do you remember what happened at the</p>	<p style="text-align: right;">89</p> <p>1 between 5 and 60 percent by volume orange oil. The</p> <p>2 second ingredient is a pharmaceutically acceptable</p> <p>3 moisturizer and the third ingredient is an</p> <p>4 emulsifying agent. Do you see that?</p> <p>5 A. Well, you had me read section 4. That</p> <p>6 doesn't say that at all.</p> <p>7 Q. I said starting with line 4.</p> <p>8 A. That is number 4, isn't it? Oh, sorry.</p> <p>9 Q. That's okay.</p> <p>10 (Witness examines document.)</p> <p>11 A. It's pretty much mumbo jumbo to me. What</p> <p>12 do you want to know?</p> <p>13 BY MR. WARD:</p> <p>14 Q. I want to know for each of these</p> <p>15 ingredients, we will go through them one at a time,</p> <p>16 whether it was your idea, Greenspan's idea or a</p> <p>17 joint idea. Okay?</p> <p>18 The first idea is five percent to</p> <p>19 60 percent orange oil?</p> <p>20 MR. BURATTI: Objection. Calls for a legal</p> <p>21 conclusion.</p> <p>22 A. That would have been between the two of us.</p>